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12 *L. McDonald; and Betsy Fretwell*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 SUSAN D'ANDREA, individually and as  
16 special administratrix of the Estate of Brandon  
Charles Pickford; JEFFREY PICKFORD,  
17 individually; and TYLER JORDAN ROSS,  
individually,

18 Plaintiffs,

19 vs.

20 CITY OF LAS VEGAS; LAS VEGAS FIRE &  
21 RESCUE; WILLIAM L. MCDONALD,  
individually and in his capacity as Fire Chief;  
22 BETSY FRETWELL, individually and in her  
capacity as City Manager; and JOHN DOES I  
23 through X, inclusive,

24 Defendants.

CASE NO.: 2:15-cv-01300-GMN-VCF

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR LAS  
VEGAS DEFENDANTS TO REPLY TO  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' MOTION TO DISMISS**

**(First Request)**

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26 Pursuant to Local Rules 6-1, 6-2 and 7-1, Defendants City of Las Vegas, Las Vegas Fire  
27 & Rescue, William L. McDonald, and Betsy Fretwell ("Las Vegas Defendants"), and Plaintiffs  
28 Susan D'Andrea, Jeffrey Pickford, and Tyler Jordan Ross, by and through their respective

1 counsel, hereby stipulate and respectfully request that the Court extend the deadline by ten (10)  
2 days for the Las Vegas Defendants to reply to Plaintiffs' Opposition to Defendants' Motion to  
3 Dismiss. The Las Vegas Defendants' responsive pleading is presently due on **Monday,**  
4 **October 5, 2015**, and the parties have stipulated that the defendants shall reply to the Plaintiff's  
5 Opposition to the City Defendants' Motion to Dismiss by **Wednesday, October 14, 2015**.

6 This extension request is not being sought to unduly delay the proceedings; rather, good  
7 cause exists for this extension as the Las Vegas Defendants require the additional time because  
8 the Las Vegas City Attorney's Office, including its attorneys are attending and hosting the  
9 International Municipal Lawyers' Association annual conference that is being held at the Rio  
10 Hotel & Casino and will be running through next week.

11 An additional ten (10) days for the Las Vegas Defendants to file their reply will not alter  
12 the date of any event or any deadline already fixed by Court order.

13 DATED: October 1, 2015

DATED: October 1, 2015

14  
15 /s/ John Curtas  
16 JOHN CURTAS  
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20 IT IS SO ORDERED:

21   
22 \_\_\_\_\_  
23 Gloria M. Navarro, Chief Judge  
24 UNITED STATES DISTRICT JUDGE

25 DATED: October 21, 2015  
26  
27  
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